

## UNITED STATES DISTRICT COURT

for the

District of

Division

Case No.

(to be filled in by the Clerk's Office)

Gregg J. Moree

*Plaintiff(s)*  
*(Write the full name of each plaintiff who is filing this complaint.  
If the names of all the plaintiffs cannot fit in the space above,  
please write "see attached" in the space and attach an additional  
page with the full list of names.)*

-v-

Jury Trial: (check one)  Yes  No

Steve Wynn, Wayne Huizenga, Sal DiDomenico,  
Michael E. Capauano, Carlos Vidueira, Alex Muo,  
John Fish and Mark Erlich

*Defendant(s)*  
*(Write the full name of each defendant who is being sued. If the  
names of all the defendants cannot fit in the space above, please  
write "see attached" in the space and attach an additional page  
with the full list of names.)*

## COMPLAINT FOR A CIVIL CASE

## I. The Parties to This Complaint

## A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Gregg J Moree
Street Address	25 Fairfield St
City and County	Cambridge, Middlesex County
State and Zip Code	Massachusetts 02140
Telephone Number	617-710-5574
E-mail Address	gimoree@gmail.com

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (*if known*). Attach additional pages if needed.

## Defendant No. 1

Name	Steve Wynn
Job or Title ( <i>if known</i> )	
Street Address	3131 Las Vegas Blvd. South
City and County	Las Vegas, Clark County
State and Zip Code	Nevada 89109
Telephone Number	702-770-7000
E-mail Address ( <i>if known</i> )	

## Defendant No. 2

Name	Wayne Huizenga
Job or Title ( <i>if known</i> )	
Street Address	4200 North Flagular Drive
City and County	West Palm Beach, Palm Beach County
State and Zip Code	Florida 33407
Telephone Number	561-844-1800
E-mail Address ( <i>if known</i> )	

## Defendant No. 3

Name	Sal DiDomenico
Job or Title ( <i>if known</i> )	
Street Address	24 Beacon St Room 208
City and County	Boston, Suffolk County
State and Zip Code	Massachusetts, 02133
Telephone Number	617-722-1650
E-mail Address ( <i>if known</i> )	

## Defendant No. 4

Name	Michael E. Capuano
Job or Title ( <i>if known</i> )	
Street Address	1414 Longworth House Office Building
City and County	Washington, DC
State and Zip Code	Washington, DC 20515
Telephone Number	202-225-5111

## Defendant # 5

Name	Carlos Vidueira
Job or Title (if known)	
Street Address	4200 North Flagular Drive
City and County	West Palm Beach, Palm Beach County
State and Zip Code	Florida 33407
Telephone Number	561-844-1800
E-mail Address (if known)	

## Defendant # 6

Name	Alex Muto
Job or Title (if known)	
Street Address	4200 North Flagular Drive
City and County	West Palm Beach, Palm Beach County
State and Zip Code	Florida 33407
Telephone Number	561-844-1800
E-mail Address (if known)	

## Defendant # 7

Name	John Fish
Job or Title (if known)	
Street Address	65 Allerton St
City and County	Boston, Suffolk
State and Zip Code	Massachusetts 02119
Telephone Number	(617) 445-3500
E-mail Address (if known)	

## Defendant # 8

Name	Mark Erlich
Job or Title (if known)	
Street Address	48 Peter Parley Rd.
City and County	Jamaica Plain, Suffolk County
State and Zip Code	Massachusetts 02130
Telephone Number	617-438-8013
E-mail Address (if known)	

E-mail Address (*if known*) \_\_\_\_\_**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (*check all that apply*)

- Federal question       Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

**A. If the Basis for Jurisdiction Is a Federal Question**

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

**B. If the Basis for Jurisdiction Is Diversity of Citizenship**

## 1. The Plaintiff(s)

## a. If the plaintiff is an individual

The plaintiff, (*name*) Gregg J. Moree \_\_\_\_\_, is a citizen of the \_\_\_\_\_,  
State of (*name*) Massachusetts \_\_\_\_\_.

## b. If the plaintiff is a corporation

The plaintiff, (*name*) \_\_\_\_\_, is incorporated  
under the laws of the State of (*name*) \_\_\_\_\_,  
and has its principal place of business in the State of (*name*) \_\_\_\_\_.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

## 2. The Defendant(s)

## a. If the defendant is an individual

The defendant, (name) \_\_\_\_\_, is a citizen of \_\_\_\_\_.  
 the State of (name) \_\_\_\_\_. Or is a citizen of \_\_\_\_\_.  
 (foreign nation) \_\_\_\_\_.

b. If the defendant is a corporation

The defendant, (name) \_\_\_\_\_, is incorporated under \_\_\_\_\_  
 the laws of the State of (name) \_\_\_\_\_, and has its  
 principal place of business in the State of (name) \_\_\_\_\_.  
 Or is incorporated under the laws of (foreign nation) \_\_\_\_\_,  
 and has its principal place of business in (name) \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

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 Because my family was (and is) a pioneer family in the Palm Beach County Historical Society, listed in Conchtown USA book, my family's heritage was involved in my having the contacts in question in the first place. I feel that, in addition to monetary loss, there was also irreparable damage to my family's reputation and historical property.

### III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

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 On or about January 31st 2012 I met Michael Capuano and Dan Ryan at Mr. Capuano's office to discuss my interview of the Honey Fitz boat. I gave him information for where to contact people in Florida about that boat. Mr. Wynn's boat is the next yacht over and I gave them information about that contact information, too. I gave this information with the understanding that I would be involved in negotiations, and profits, as a finder's fee from them using this contact information to facilitate the contracts for the building of the casino. Instead all of the defendants conspired to leave me out of any deals regarding the casino.  
 The above defendants also conspired in Florida to jeopardize my land deal for 100 21st St. in Riviera Beach, FL and my involvement in the Wynn Harbor Casino when they went to Florida, on and before September 14th, 2014.

#### IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

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One and a half percent of interest in the Casino in Everett, MA. \$4,000,000 to replace my property deal for 100 21st Street in Riviera Beach, Fl. A Boat slip in Rybovich Yacht in West Palm Beach Florida. A park in memory of grandmother, Edith Moree, on 13th Street in Riviera Beach, FL built by Suffolk Construction. A job as Union carpenter foreman and CEO of Wynn Harbor Casino in Everett, MA. An agreement for the Carpenters Union to build 6 skyscrapers on North Flagular Drive in West Palm Beach, FL.

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#### V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

##### A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:

Signature of Plaintiff

Printed Name of Plaintiff      Gregg J. Moree



##### B. For Attorneys

Date of signing:

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

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Telephone Number

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E-mail Address

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